

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TOBIAS MOELLER-BERTRAM,
individually, and on behalf of all others
similarly situated,

Plaintiff,

V.

GEMINI TRUST COMPANY, LLC; and
DIGITAL CURRENCY GROUP, INC.

Defendants.

Case No. 1:23-cv-02027

Hon. Lewis J. Liman

NOTICE OF MOTION TO REMAND TO STATE COURT

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and the declaration of JooYun Kim, dated April 7, 2023 with exhibits attached thereto, Plaintiff Tobais Moeller-Bertram, by and through his undersigned counsel, will move this Court before the Honorable Lewis J. Liman, at the United States Courthouse, 500 Pearl Street, New York, New York, 10001, for an Order, pursuant to 28 U.S.C. § 1447, remanding this case to the New York State Supreme Court, New York County, and for any further relief that the Court may deem just and proper.

DATED: April 7, 2023

HGT LAW

/s/ JooYun Kim

Hung G. Ta, Esq.

JooYun Kim, Esq.

Natalia D. Williams, Esq.

250 Park Avenue, 7th Floor

New York, New York 10177

Tel: (646) 453-7288

Fax: (646) 453-7289

Email: hta@hgtlaw.com

jooyun@hgtlaw.com

natalia@hgtlaw.com

William R. Restis, Esq.

402 West Broadway, Suite 1520

San Diego, CA 92101

Tel: +1.619.270.8383

Email: william@restislaw.com

*Attorneys for Plaintiff and Proposed Class
Counsel*